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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA

**In re:** **Case No. 09-40099 RLE**  
**WILLIAM JOSEPH REYES and** **Chapter 13**  
**LISA ANNE REYES,**  
**Debtors.** **MOTION TO MODIFY CHAPTER 13 PLAN**

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The above-named debtors apply to the court for an order to modify their Chapter 13 Plan as follows:

Debtors' October & November 2011 plan payments shall be suspended. Commencing December 2011, debtors will pay \$586.00 per month to the Trustee. Any plan arrearages shall be forgiven. Unsecured, non-priority creditors shall be paid on a pro-tanto basis.

The modification is sought on the following grounds:  
Debtors have lost their jobs, but expect to find employment soon.  
Dated: October 12, 2011

/s/ Patrick L. Forte  
Patrick L. Forte  
Attorney for Debtors